

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ALICIA MARTIN,

Plaintiff,

v.

UNIVERSITY MEDICAL CENTER OF
SOUTHERN NEVADA;

Defendant(s).

Civ. No. 2:24-cv-00357-APG-EJY

~~PROPOSED DISCOVERY PLAN~~
AND SCHEDULING ORDER

SPECIAL SCHEDULING REVIEW
REQUESTED

The parties held a scheduling conference under Federal Rule of Civil Procedure 26(f) on July 1, 2024. The parties now submit their proposed discovery plan and seek special scheduling review.

Statement of Reasons for Special Scheduling Review

The parties believe that an additional 90 days of discovery is necessary due to (1) the complexity of discovery in this case, (2) the fact that plaintiff's lead counsel is expecting the birth of his first child this month, and (3) the hopes that the parties can negotiate and reach a settlement before then.

1. Discovery Cut-Off Date. The first defendant answered or otherwise appeared on May 17, 2024. The discovery cut-off date is **February 11, 2025**.

2. Amending the Pleadings and Adding Parties. The deadline to amend the pleadings and add parties is **November 13, 2024**

3. Expert and Rebuttal-Expert Disclosures. The deadline to disclose experts is **December 13, 2024**. The deadline to disclose rebuttal experts is **January 13, 2025**.

4. Dispositive Motions. The deadline to file dispositive motions is **March 13, 2025**.

5. Pretrial Order. The deadline to file a pretrial order is **April 13, 2025**.

6. Fed. R. Civ. P. 26(a)(3). The disclosures required by this rule and any objections to them must be included in the joint pretrial order. [Unless the parties stipulate otherwise in this proposed discovery plan and scheduling order and the court so orders.]

7. Alternative Dispute Resolution. The parties certify that they met and conferred about the possibility of using alternative dispute-resolution processes including mediation, arbitration, and if applicable, early neutral evaluation.

8. Alternative Forms of Case Disposition. The parties certify that they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 ~~and the use of the Short Trial Program (General Order 2013-01).~~

9. Electronic Evidence. The parties certify that they discussed whether to present evidence in electronic format to jurors for the purpose of jury deliberations. [Applies only in cases in which a jury trial has been demanded. If applicable, state any stipulations the parties reached regarding providing discovery in an electronic format compatible with the court's electronic jury evidence display system.]

IT IS SO STIPULATED.

Dated: July 1, 2024

By /s/ Andrew Rozynski
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ALICIA MARTIN

IT IS SO ORDERED.


U.S. MAGISTRATE JUDGE

Dated: July 2, 2024

By /s/ Matthew T. Dushoff
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